



June 15, 2022

Bonnie Soriano
Branch Chief, Freight Activity Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

VIA EMAIL: shorepower@arb.ca.gov

RE: California Air Resources Board ("CARB") March 28, 2022 Letter to Shore Terminals LLC, Selby (Crockett)

Dear Ms. Soriano:

Shore Terminals LLC, Selby, located in Crockett, CA, (Shore Terminals Selby) received CARB's March 28, 2022, letter and provides this response.

Letter Bullet 1: Section 93130.14(a)(3)(A) of the Regulation requires the terminal plan to identify and describe all necessary equipment, including whether it will be located on the vessel, wharf, shore, or elsewhere.

- The Plan states that there is no way to comply with the Regulation but lists CARB-approved Emission Control Strategy (CAECS) as the equipment that will be used at berth ROD 8. The requirement to reduce emissions from tankers in Southern California begins in 2075. Section 93130.14(a)(3)(H) of the Regulation requires a terminal operator claiming that a physical and/or operational constraint will delay its ability to implement its preferred CAECS to achieve emission reductions from vessels at berth according to the requirements of section 93130 et seq., must also include with its terminal plan a technology feasibility study evaluating if any other emission control options could be implemented more quickly at the terminal. The Selby Terminal Plan did not include a technical feasibility study and CARB staff requests a study that evaluates whether any other control options could be implemented more quickly at the terminal.
- In addition, please provide any supporting information such as the Moffatt Nichols and DNV GL USA, Inc. Maritime reports that you reference in your plan to provide evidence concerning the availability of the technology.

Response: Shore Terminals Selby is not claiming that there is a physical or operational constraint that will delay our ability to implement their preferred CARB-approved control strategy. Shore Terminals Selby has stated that there is currently no commercially available CARB-approved control technology to comply with the regulation. Shore Terminals Selby bases this position on the WSPA-commissioned technology assessment, which was previously provided to CARB by DNV GL USA, Inc. Maritime. The DNV GL USE, Inc. technology assessment is provided with this response.



Letter Bullet 2: Section 93130.14(a)(3)(E) of the Regulation requires the terminal to provide any terminal/port specific berthing restrictions for each emission control strategy. While the plan does mention berthing restrictions are regulated by the existing Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS) terminal operating limits, CARB staff requests that the plan specifically details which specific berthing restrictions would present themselves at berth ROD 8 for each emissions control strategy; and

Response: Shore Terminals Selby has not selected a control technology because there is currently no commercially available CARB-approved control technology(s) to comply with the regulation. Shore Terminals Selby will be able to identify any specific berthing restrictions presented by the control technology(s) selected once CARB-approved control technologies are available.

Letter Bullet 3: Section 93130.14(a)(3)(F) of the Regulation requires the terminal to provide a schedule for installing equipment.

Response: As there are currently no commercially available CARB-approved technology(s) to comply with the regulations, a schedule for installing equipment cannot be provided at this time.

Shore Terminals Selby is committed to evaluating control technologies as they become available. Once those technologies have received all required regulatory approvals, a control technology can be assessed, and the terminal plan can be updated to reflect the specifics of the chosen control technology(s).

Sincerely,

Chris Vratil
GM Pipeline & Terminal Operations, West Region
Shore Terminals LLC